

NATIONAL COAL TRANSPORTATION ASSOCIATION

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April 23, 2019

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Office of Proceedings
April 23, 2019
Part of
Public Record

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The Honorable Cynthia T. Brown
Chief, Section of Administration, Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423-0001

Re: Notice of Intent to Participate in Docket No. EP 754
OVERSIGHT HEARING ON DEMURRAGE AND
ACCESSORIAL CHARGES

Dear Ms. Brown:

The National Coal Trans Association (NCTA) intends to participate in the public hearing to be held on May 22, 2019, in the above-captioned proceeding.

The NCTA commends the Surface Transportation Board (STB) for allowing stakeholders and carriers to provide relevant data and narratives regarding the tariff-imposed demurrage charges and accessorial charges. The NCTA represents a geographically diverse membership of electric utilities, coal producers, consultants, and component and service providers for railcars. Our members have invested many millions of dollars at mines, power plants, and repair facilities to enhance the operating efficiency of rail carriers. There is strong interest in the fairness and reciprocity of the implementation of these costly tariff provisions.

Accordingly, Mr. John Ward, the Executive Director of NCTA, is requesting 5 minutes for direct testimony to provide comments and the preliminary results of our internal survey of members. Relevant information regarding their experience with the fairness and costs of tariff-imposed charges was solicited. It is desirable that a panel of coal interests be assembled to testify, and NCTA respectfully requests that Mr. Ward be on this panel.

Respectfully Submitted,

Thomas C. Canter
Executive Director Emeritus